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OFFICE OF LEGAL COUNSEL  
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DALLAS, TEXAS**



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Tuesday, April 27, 1999  
DATE

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NUMBER OF PAGES, INCLUDING COVER

**RE:**

To: _____	David Guzy	From: _____	DEBORAH BAHN HAGLUND MEPUS
_____	Minerals Management Services Company	_____	Office of Legal Counsel - Dallas, Texas Department
_____	P. O. Box 25165, Denver, CO 80225-0165 Location (City, State, Unit)	_____	(214) 951-3350 / Big Mat 323-3350 Phone Number
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**COMMENTS:**

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**Mobil**

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DEBORAH BAHN HAGLUND  
COUNSEL  
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MEPUS PRACTICE GROUP

April 27, 1999

VIA TELECOPY (303)-231-3194  
ORIGINAL VIA U.S. MAIL

Mr. David S. Guzy  
Chief, Rules and Procedures Staff  
Minerals Management Service  
P.O. Box 25165, Mail Stop 3101  
Denver, Colorado 80225-0165

Re: Comments on Crude Oil Valuation Rulemaking, 64 FR 12267 (March 12, 1999)

Dear Mr. Guzy:

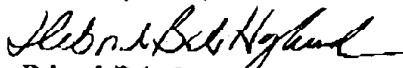
Mobil Business Resources Corporation, on behalf of Mobil Exploration & Producing U.S. Inc. and its producing affiliates (collectively "Mobil"), appreciates the opportunity to comment on the Minerals Management Service ("MMS") crude oil valuation rulemaking. As a significant producer of federal oil, Mobil has a substantial interest in the outcome of this rulemaking.

Mobil concurs with the written comments submitted by the American Petroleum Institute, the Independent Producers Association of America, the Domestic Petroleum Council and the United States Oil & Gas Association. It therefore adopts and incorporates those comments by reference as its own.

Mobil particularly reiterates the associations' request that MMS convene another workshop or a symposium to consider further the issue of transportation allowances. This is a complex issue that can significantly affect the economics of development, particularly OCS development. The associations' recommendations regarding this issue deserve full and complete consideration by the agency.

We appreciate your consideration of our comments. If you have any questions regarding the comments, please call the undersigned at 214-951-3349.

Very Truly Yours,

  
Deborah Bahn Haglund